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March 29, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

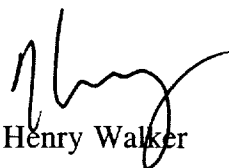
Re: Docket to Establish Generic Performance Measurements, Benchmarks and
Enforcement Mechanisms for BellSouth Telecommunications, Inc.
Docket No. 01-00193

Dear David:

Enclosed are the original and thirteen copies of a Motion for Extension of Time to
file comments in the above-captioned proceeding filed on behalf of the Southeastern Competitive
Carriers Association. Copies have been forwarded to AT&T, BellSouth, and the Consumer
Advocate.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Attachment

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re: Docket to Establish Generic)
Performance Measurements, Benchmarks) Docket No. 01-00193
and Enforcement Mechanisms for)
BellSouth Telecommunications, Inc.)

MOTION FOR EXTENSION OF TIME

The Southeastern Competitive Carriers Association ("SECCA") respectfully requests that the Hearing Officer grant SECCA an extension of time for filing comments in the above-captioned proceeding. For the reasons explained below, SECCA also suggests that the extension be granted to other parties as well.

The Hearing Officer's request for comments states that the Tennessee Regulatory Authority ("TRA") has adopted "as a base line the performance measurements, benchmarks and enforcement mechanisms that were ordered in the DeltaCom arbitration (Docket No. 99-00430)." The notice asks whether those "performance measurements, benchmarks and enforcement mechanisms" (hereinafter referred to as the "DeltaCom Plan") should be revised.

In discussing how SECCA members should respond to the notice, counsel for SECCA has learned that not only is there no copy of the DelatCom Plan in any of the orders issued in the DeltaCom arbitration proceeding but that there is apparently no copy in existence anywhere.¹ Various pieces of the Plan can only be found in the evidentiary record of the

¹ Counsel for SECCA understands that the "Plan" is, in fact, a compilation of the "Best and Final Offers" made by BellSouth and DeltaCom. To create a copy of the Plan, one would therefore have to obtain copies of the parties' Best and Final Offers and then mix and match portions of those Offers in accordance with the TRA's decisions. (It is not clear at this time whether even BellSouth or DeltaCom has yet performed this task.) Unless this process is done
(continued...)

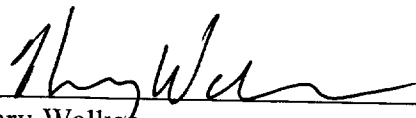
DeltaCom arbitration. Even if one were to locate that information, it is unclear whether someone not a party to that proceeding can accurately compile and interpret the Plan without assistance.

In order to comment intelligently on the DeltaCom Plan, SECCA members (and all other parties) need to be provided with an accurate and official copy of the Plan. Unless this occurs, the Hearing Officer's request is not likely to produce the desired results. In the absence of a copy of the Plan, the parties will likely file their own "off the shelf" proposals for performance measures and penalties without specific reference to the DeltaCom Plan. Such filings would presumably be of marginal use to the agency.

Therefore, SECCA requests that, as soon as practical, the TRA compile and make available on the agency's website a complete and official copy of the DeltaCom Plan. If possible, the site should also indicate the name or names of TRA staff members who can answer questions about how the Plan will work. SECCA asks that all parties then be given a reasonable time thereafter to file comments addressing the issues raised in the notice.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

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¹(...continued)

by the TRA itself, the parties filing comments in this docket have no assurance that the compilation has been done accurately and in accordance with the agency's rulings.